

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	No. 4:20CR419 SEP/SPM
)	
BONMENE SIBE)	
)	
Defendant.)	

DEFENDANT'S SUPPLEMENT TO DETENTION HEARING

COMES NOW, Defendant, Bonmene Sibe, through his attorney, Kayla L. Williams, Assistant Federal Public Defender, and hereby supplements the Detention Hearing held on August 31, 2020 with the following information:

1. Mr. Sibe has substantial ties to the community through his employment which was confirmed through an interview between Pretrial Services Officer, Bradley Rentfro, and Mr. Sibe's sister Namne Kogbora.
2. Through his employment, Mr. Sibe would be able to make payments towards his property tax arrears to ensure that he does not lose his home.
3. Additionally, Mr. Sibe has been living at the same address since 2015, and is a legal permanent resident of the United States. Any concerns regarding Mr. Sibe's whereabouts could be addressed through the use of a location monitoring bracelet.

4. Mr. Sibe has had a history of failures to appear for municipal traffic offenses, which are not uncommon due to the lack of legal representation in these types of cases.
5. Given the seriousness and the potential ranges of punishment, Mr. Sibe has a greater incentive to ensure that he reports to the Pretrial Services Office and attends all court dates.
6. Conditions similar to those applied for offense involving internet and electronic devices could be ordered to limit Mr. Sibe's access and ensure the safety of the community.

WHEREFORE, for the foregoing reasons in addition to the reasons stated during the Detention Hearing, Mr. Sibe respectfully requests, he be granted pretrial release with any conditions the Court deems necessary.

Respectfully submitted,

/s/Kayla L. Williams
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Tracy Berry, Assistant United States Attorney.

/s/Kayla L. Williams

KAYLA L. WILLIAMS, #67054MO
Assistant Federal Public Defender